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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PHILIP MORRIS INCORPORATED,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.
	:	
SEGA ENTERPRISES, INC.(U.S.A.),	:	
	:	
Defendant.	:	

-----x

COMPLAINT

CROP
+ Brown JP

PHILIP MORRIS INCORPORATED, by its counsel, HUNTON &
WILLIAMS, complaining of defendant SEGA ENTERPRISES, INC.
(U.S.A.), alleges:

The Parties

1. Plaintiff Philip Morris Incorporated ("Philip Morris")
is a corporation duly organized and existing under the laws of
the Commonwealth of Virginia, and has its principal offices at
120 Park Avenue, New York, New York 10017.

2. Upon information and belief, defendant Sega
Enterprises, Inc. (U.S.A.) ("Sega") is a corporation duly
organized and existing under the laws of the state of California,
and has its principal place of business at 2149 Paragon Drive,
San Jose, California 95131.

Jurisdiction and Venue

3. Subject matter jurisdiction arises under Section
1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1) in that
the parties are citizens of different states within the meaning

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